Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Revitalization of the AM Radio Service	)	
Second Further Notice of Proposed Rule Making and Notice of Inquiry, Revitalization of the AM Radio Service	)	MB Docket No. 13-249

To: The Commission

REPLY COMMENTS OF AM BROADCAST LICENSEES

Charles A. Hecht & Associates, Inc. ("Hecht Associates"), pursuant to FCC Rule Section 1.401, submits reply comments on behalf of AM Broadcast Licensees (AMBL) on the above captioned Second Further Notice of Proposed Rule Making ("SFNPRM") wherein the FCC seeks to investigate possible changes to its rules which would allow AM broadcasters to better serve the public.

Introduction

AMBL is comprised of a group of 58 AM radio station licensees which operate 138 AM stations throughout the United States[1]. Hecht Associates is a broadcast engineering consulting firm which has represented the technical needs of hundreds of AM stations before the FCC for over 40 years. AMBL submitted comments and reply comments in support of specific proposals in the First Notice of Proposed Rulemaking ("FNPRM"). AMBL has reviewed the comments filed by others in this proceeding and seeks to address comments which AMBL feels are scientifically

[1] See Appendix

inaccurate or misleading. In addition, AMBL wishes to amplify its prior discussion of interference.

Interference

Similar to the FNPRM, the heart of the SFNRPM relates to AM broadcast signal interference and when it occurs. In order to establish interference standards, it is necessary to first establish standards which constitute service. Once service is defined, interference standards can be determined. Service levels need to be based on standards that are representative of current electrical noise levels and not historical levels which are no longer realistic. It is the opinion of AMBL and the majority of the comments filed that 0.1 mV/m service is a dinosaur that has become extinct. Defining protected groundwave service level for Class A stations as 0.5 mV/m is appropriate today and even that level may be generous at night or during the critical hours. AMBL supports Alternative 2 of the SFNPRM regarding critical hours and nighttime allocations with a preference for site to site calculations.

Comments of Others

In the FNPRM, the primary argument advanced by comments supporting Class A interests was attempting to make a case that the changes proposed would create massive interference affecting large populations in service areas claimed by Class A stations. Responsive comments were submitted which have correctly noted the calculation of Class A station nighttime interference areas and affected populations claimed by others employing the contour overlap method are incorrect and misleading as they portray a much greater interference area and population count than the use of actual desired to undesired signal calculation. The significance of the population data is further diminished by counting population in areas where signal levels are below service FCC standards. AMBL supports these comments.

In the SFNPRM, some of the comments supporting Class A interests attempted to apply the same interference arguments to justify potential harm to the Federal Emergency Management Agency (FEMA) Integrated Public Alert Warning System ("IPAWS") and the Emergency Alert System ("EAS"). The comments are incorrect and misleading as they portray a much greater interference area and population count than computations based on the use of actual data from information obtained from the FCC database and carry a draconian implication national security interests would be jeopardized.

A good example of this approach is shown in Figure 1-N of the FEMA comments. Figure 1-N is a map showing "interference free" signal contours for Class A station WBT Charlotte, North Carolina. The WBT 50% skywave service area plotted is based on a nighttime interference free ("NIF") field strength value of 0.5 mV/m. However, when the NIF signal of WBT is calculated using current FCC methodology based on the actual operating parameters of other stations that impact WBT, the NIF signal is 4.60 mV/m, more than eight times greater than the 0.5 mV/m used in Figure 1-N. The result is interference areas and population counts based on Figure 1-N are grossly exaggerated. Ironically, the two stations that are primary contributors to the WBT NIF are also Class A stations, WTAM Cleveland, Ohio and KMOX St. Louis, Missouri. Due to international agreements. it is significant to add that FCC rules exclude most foreign stations from being "counted" in the NIF if they are classified on the "B" station list. Regardless of classification, these stations are broadcasting signals that are real world contributors to Class A stations NIF signals. If "B" list stations were counted for WBT, the NIF would increase to 5.65 mVm. WBT is not unique. Many Class A stations NIF signal values are negatively impacted by "B" list stations.

The reality is, similar to daytime 0.1 mV/m service, Class A nighttime 0.5 mV/m interference free service does not exist. Based on studies conducted by Hecht Associates, most Class A stations NIF values are significantly higher than 0.5 mV/m, and if the real world NIF values including the "B" list stations were counted, the average Class A NIF signal values would be approximately 2 mV/m.

Additionally, comments regarding negative effects to the operation of IPAWS and EAS are not realistic. In 47 U.S.C. Section 606, WAR POWERS OF PRESIDENT, the language clearly states operation of non-system stations would have to be terminated. Thereby, no harm to the system would occur.

Lastly, "lost" service cited in the comments to the greater New York, Philadelphia and Washington DC areas would not be a factor even if the underlying coverage data supported the claims since all of these metropolitan areas are served by local Class A stations. For example, the greater New York area is served by more than three Class A stations, including WABC, WCBS and WFAN. Philadelphia is served by WPHT and Washington DC is served by WTOP.

Conclusion

Broad based support for the proposed changes has been expressed in the majority of the comments filed, including many of the country's leading, experienced engineering firms. The allocation changes proposed will provide a long overdue updating of many rules that are no longer relevant and will revitalize AM broadcasting. The FCC needs to implement these changes promptly.

Respectfully submitted,

CHARLES A. HECHT & ASSOCIATES, INC.

By: /s/
Charles A. Hecht, President
March 9, 2019

APPENDIX

LICENSEES AND STATIONS REPRESENTED

BY AM BROADCAST LICENSEES (AMBL)

LICENSEE	STATION
1 Costa-Eagle Radio Ventures Limited Partnership	1 WMVX Salem, NH 2 WUBG Methuen, MA 3 WNNW Lawrence, MA 4 WCCM Haverhill, MA
2 Evanston Broadcasting LLC	5 WCGO Evanston, IL
3 Forbis Communications, Inc.	6 WLOC Munfordville, KY
4 Old Northwest Broadcasting, Inc.	7 WAOV Vincennes, IN
5 The Original Company, Inc.	8 WTAY Robinson, IL 9 WRCY Robinson, IL 10 WFIW Fairfield, IL
6 Jacksonville Area Radio Broadcasters, Inc.	11 WLDS Jacksonville, IL
7 Pottsville Broadcasting Company	12 WPPA Pottsville, PA
8 Cantico Nuevo Ministry, Inc.	13 WNYG Medford, NY 14 WXMC Par.-Troy Hill, NJ 15 WLIM Patchogue, NY 16 WTHE Mineola, NY
9 Holy Family Communications	17 WHIC Rochester, NY 18 WQOM Natick, MA
10 Cantroair Communications, Inc.	19 WTZN Troy, PA 20 WTTC Towanda, PA
11 Royse Radio, Inc.	21 WCLU Glasgow, KY
12 Port Broadcasting, LLC	22 WWSF Sanford, ME 23 WXEX Exeter, NH 24 WGUY Veazie, ME 25 WCYR Veazie, ME 26 WBAN Veazie, ME
13 First Class Radio Corp.	27 WMRC Milford, MA

APPENDIX

LICENSEES AND STATIONS REPRESENTED

BY AM BROADCAST LICENSEES (AMBL)

LICENSEE	STATION
14 Bluewater Broadcasting, LLC	28 WGMP Montgomery, AL
15 Koor Communications, Inc.	29 WCFR Springfield, VT 30 WCVR Randolph, VT 31 WCNL Newport, NH 32 WUVR Lebanon, NH
16 Radio Amor, Inc.	33 WADS Ansonia, CT
17 Way Broadcasting Licensee, LLC	34 KDFT Ferris, TX 35 KVRI Blaine, WA 36 KARI Blaine, WA 37 WFBR Glen Burnie, MD 38 KATD Pittsburg, CA 39 KLIB Roseville, CA 40 KFSG Roseville, CA 41 WZHF Arlington, VA
18 Just Because, Inc.	42 WGFP Webster, MA
19 WHOL Radio, Inc.	43 WHOL Allentown, PA 44 WEST Easton, PA
20 Durand Broadcasting	45 WRDN Durand, WI
21 Bristol County Broadcasting, Inc.	46 WSAR Fall River, MA
22 SNE Broadcasting, LTD	47 WHTB Fall River, MA
23 Wild West Radio Corporation	48 KKIM Albuquerque, NM 49 KXKS Albuquerque, NM
24 Wilkins Communication Network, Inc.	50 KLNG Council Bluffs, IA
25 Alabama Radio Corporation	51 WASG Daphne, AL
26 Mobile Bay Corporation	52 WIJD Prichard, AL
27 Pensacola Radio Corporation	53 WNVY Cantonment, FL 54 WVTJ Pensacola, FL

APPENDIX

LICENSEES AND STATIONS REPRESENTED

BY AM BROADCAST LICENSEES (AMBL)

LICENSEE	STATION
28 Richmond Christian Radio Corporation	55 WDZY Colonial Heights VA
29 Capital City Radio Corporation	56 KIOU Shreveport, LA 57 KWDF Ball, LA
30 Cajun Radio Corporation	58 WCPC Houston, MS
31 New England Communications, Inc.	59 WBXR Hazel Green, AL
32 Bob Wilkins Radio Network Broadcasting, Inc.	60 KERI Bakersfield, CA
33 Heritage Christian Radio, Inc.	61 WBRI Indianapolis, IN
34 Steel City Radio, Inc.	62 WWNL Pittsburgh, PA 63 WYYC York, PA 64 WITK Pittston, PA
35 Kansas City Radio, Inc.	65 KCNW Fairway, KS
36 Macon Media, Inc.	66 WSKY Asheville, NC
37 J. J. & B. Broadcasting, Inc.	67 WFAM Augusta, GA
38 Upstate Radio, Inc.	68 WELP Easley, SC
39 Grace Media, Inc.	69 WLMR Chattanooga, TN
40 Steven J. Callahan	70 WVBF Middleboro. Ctr.,MA
41 Gois Broadcasting LLC	71 WORC Worcester, MA
42 Gois Broadcasting Boston, LLC	72 WAMG Dedham, MA 73 WLLH Lowell, MA
43 Gois Broadcasting of Connecticut, LLC	74 WKND Windsor, CT 75 WNEZ Manchester, CT 76 WLAT New Britain, CT
44 Logan Radio Incorporated	77 WRUS Russellville, KY

APPENDIX

LICENSEES AND STATIONS REPRESENTED

BY AM BROADCAST LICENSEES (AMBL)

LICENSEE	STATION
45 Colonial Radio Group of Williamsport, LLC	78 WLYC Williamsport, PA 79 WEJS Jersey Shore, PA 80 WWGE Loretto, PA
46 Caribbean Radio Group, Inc.	81 WPOM Riviera beach, FL 82 WIRA Fort Pierce, FL
47 Multicultural Radio Broadcasting Licensee, LLC	83 KXYZ Houston, TX 84 KSJZ San Jose, CA 85 WEXY Wilton Manors, FL 86 KMNY Hurst, TX 87 KXPA Bellevue, WA 88 KEST San Francisco, CA 89 KYPA Los Angeles, CA 90 WZRC New York, NY 91 KBLA Santa Monica, CA 92 WHWH Princeton, NJ 93 KIQI San Francisco, CA 94 KAZN Pasadena, CA 95 WPAT Paterson, NJ 96 KMRB San Gabriel, CA 97 WLYN Lynn, MA 98 WLXE Rockville, MD 99 WJDM Elizabeth, NJ 100 WNMA Miami Springs, FL 101 KAHZ Pomona, CA 102 KWRU Fresno, CA 103 KCHN Brookshire, TX 104 WAZN Watertown, MA 105 WKDM New York, NY 106 WTTM Lindenwold, NJ 107 WWRU Jersey City, NJ 108 WJCC Miami Springs, FL
48 G2 Media Group LLC	109 KFSW Fort Smith, AK
49 Money Matters Radio, Inc.	110 WBNW Concord, MA

APPENDIX

LICENSEES AND STATIONS REPRESENTED

BY AM BROADCAST LICENSEES (AMBL)

LICENSEE	STATION
50 Blount Masscom, Inc.	111 WVNE Leicester, MA 112 WSDK Bloomfield, CT
51 Catholic Radio Network, Inc.	113 KDMR Kansas City, MO 114 KEXS Excelsior Spr., MO 115 KFEL Pueblo, CO 116 KMVG Gladstone, MO 117 KRCN Longmont, CO 118 KCRN Limon, CO
52 Kansas City Catholic Network, Inc.	119 KPHN El Dorado, KS
53 Genesis Communications I, Inc.	120 WAMT Pine Cast. Sky Lk FL 121 WIXC Titusville, FL 122 WHOO Kissimmee, FL
54 Genesis Communications of Tampa Bay, Inc.	123 WMGG Dunedin, FL 124 WWBA Largo, FL 125 WHBO Pinellas Park, FL
55 Community Broadcasters, LLC	126 WHDL Olean, NY 127 WWLZ Horseheads, NY 128 WATN Watertown, NY 129 WHYM Lake City, SC 130 WWHM Sumter, SC 131 WSLB Ogdensburg, NY 132 WOLH Florence, SC
56 Langer Broadcasting Group, LLC	133 WSRO Ashland, MA 134 WZBR Dedham, MA 135 WBAS West Yarmouth, MA
57 Divine Mercy Radio, Inc.	136 WETC Wendell-Zebulon, NC
58 Marshfield Broadcasting Company, Inc.	137 WBMS Brockton, MA 138 WMEX Boston, MA